

Exhibit A

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL
CIRCUIT IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.: CACE 15-000072

BRADLEY J. EDWARDS and PAUL G.
CASSELL,

Plaintiffs,

vs.

ALAN M. DERSHOWITZ,

Defendant.

_____ /

VIDEOTAPE CONTINUED DEPOSITION OF

ALAN M. DERSHOWITZ

VOLUME 6
Pages 782 through 909

Wednesday, January 13, 2016
1:05 p.m. - 3:06 p.m.

Tripp Scott
110 Southeast 6th Street
Fort Lauderdale, Florida

Stenographically Reported By:
Kimberly Fontalvo, RPR, CLR
Realtime Systems Administrator

1 APPEARANCES:

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On behalf of Plaintiffs:

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--and--

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1 APPEARANCES (Continued):

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3 On behalf of Jeffrey Epstein:

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7 On behalf of Virginia Roberts:

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10 BY: SIGRID STONE MCCAWLEY, ESQ.
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12 ALSO PRESENT:

13 Edward J. Pozzuoli, Special Master

14 Sean D. Reyes, Utah Attorney General Office

15 Marcy Martinez, Videographer

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1 I N D E X

2 Examination Page

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4 VOLUME 6 (Pages 782 - 909)

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6 Certificate of Oath 906

7 Certificate of Reporter 907

8 Read and Sign Letter to Witness 908

9 Errata Sheet (forwarded upon execution) 909

10 PLAINTIFF EXHIBITS

11 No. Page

12 26 Business card of Jeffrey B. Levy, 792

13 Esquire

14 27 2002 Article on Child Pornography 810

15 28 Miami Beach Police Case Report Detail 822

16 29 Document reflecting entry for 877

17 30 Santa Monica Police Report 885

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1 not there are missing logs, have you --

2 A. That's not been something I've focused on.
3 I was only looking at whether or not, within the
4 timeframe, who was with who on what flights, and I
5 saw that Virginia Roberts was on some flights with
6 other prominent academics, but never on a flight
7 with me.

8 Q. Do you know who Virginia Roberts was lent
9 out to for sex by Jeffrey Epstein?

10 MR. INDYKE: Objection based upon
11 attorney-client privilege, work product.

12 A. No, I can tell you outside of the
13 privileged information. I can tell you outside of
14 the privilege. I can tell you outside of the
15 privilege that she has claimed to have had sex on
16 numerous occasions with Leslie Wexner, and was told
17 by -- by Sigrid McCawley that --

18 MS. McCAWLEY: I'm going to object to the
19 line of questioning.

20 MR. SCOTT: Time out.

21 A. That is from a statement made to me --

22 MS. McCAWLEY: No, I just want to be clear
23 because if we're going to violate the privilege
24 again, the order of seal.

25 A. We are not.

1 MS. McCAWLEY: I'm going to stop that
2 right now because the only conversations I've
3 had with you are in the context of settlement
4 discussion in this case.

5 A. It was not a conversation with Sigrid
6 McCawley. And please let me answer the question. I
7 had a conversation --

8 BY MR. EDWARDS:

9 Q. Just so we know what the question is, my
10 question is --

11 A. The question is do I know whether she had
12 sex --

13 Q. No, it's not.

14 MR. SCOTT: Let's just ask the question.

15 SPECIAL MASTER POZZUOLI: Hang on. And,
16 court reporter, please reread the question so
17 we understand.

18 COURT REPORTER: "Do you know who Virginia
19 Roberts was lent out to for sex by Jeffrey
20 Epstein?"

21 A. And the answer --

22 MR. SIMPSON: Darren had an objection for
23 you.

24 A. Okay. I understand the instruction, and I
25 can answer the question.

1 BY MR. EDWARDS:

2 Q. I just want the names of the individuals.

3 A. I can't just give you that. I can tell
4 you that --

5 Q. That's what I'm asking for.

6 SPECIAL MASTER POZZUOLI: Hang on one
7 second. The question is: Do you know who
8 Virginia Roberts was lent out to for sex by
9 Jeffrey Epstein?

10 MR. EDWARDS: Right. The names of the
11 individuals is all I'm looking for.

12 SPECIAL MASTER POZZUOLI: There's an
13 objection. Okay. Go ahead.

14 A. I was told by John Zeiger, who was Leslie
15 Wexner's lawyer, that Sigrid McCawley claims that
16 her client, Virginia Roberts, alleges that she had
17 sex with Leslie Wexner on numerous occasions,
18 including one -- and she said this, according to
19 Mr. Zeiger, very aggressively --

20 MS. McCAWLEY: This is revealing
21 confidential settlement discussions.

22 A. Between who?

23 MS. McCAWLEY: Between -- I'm not going to
24 reveal what confidential settlement discussions
25 because that breaches a privilege.